

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK -----X Ahron Braun,  Plaintiff,  -against-  United Recovery Systems, L.P.,  Defendant. -----X	7:12-cv-04687-KMK  <b><u>NOTICE OF MOTION</u></b>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------

**PLEASE TAKE NOTICE** that upon the annexed Declaration of R. David Lane, Esq., dated April 1, 2013, along with the annexed Memorandum of Law, dated April 1, 2013, by Defendant, United Recovery Systems, L.P. ("URS"), by and through its undersigned counsel, will move this Court before the Honorable Kenneth M. Karas, United States District Court Judge, at the United States District Courthouse for the Southern District of New York, 300 Qarropas St., White Plains, NY 10601, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure: (1) dismissing the Plaintiff's Amended Complaint with Prejudice and/or (2) for such further and/or other relief as the Court may deem proper in the circumstances.

Pursuant to the Order of the Honorable Kenneth M. Karas dated February 28, 2013, URS' motion papers are to be filed by April 1, 2013; Plaintiff's opposition papers are due by May 1, 2013, and URS's reply papers, if any, are due by May 15, 2013.

Dated: April 1, 2013

Respectfully submitted,

**MARSHALL DENNEHEY WARNER,  
COLEMAN & GOGGIN**

By: \_\_\_\_\_/s/\_\_\_\_\_

R. David Lane Jr. (RD 2435)  
Attorneys for Defendant  
United Recovery Systems, L.P.  
88 Pine Street, 21<sup>st</sup> Floor  
New York, New York 10005-1801  
(212) 376-6413

TO:

Ahron Braun, *Pro Se*  
4 Mountain Road, Suite 205  
Monroe, NY 10950  
Ip84510950@gmail.com